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March 2, 2012

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

CC Docket No. 96-45

CC Docket No. 02-6

"WAIVER REQUEST"

"FY2010 APPEAL"

"Administrator's Decision on Implementation Extension Request"

Contact: Tom Miller, Associate Superintendent
Phone: 520.791.2711
Fax: 520.791.2202
Email: tmiller@thepartnership.us

APPLICANT: PIMA Partnership Charter Schools
BEN: 16051398
FY2010 FORM 471: 741910

APPLICANT: Phoenix Partnership High School
BEN: 16057025
FY2010 FORM 471: 753085

This "waiver request" and "appeal" to the FCC, is written and submitted on behalf of both the PIMA Partnership Charter Schools (BEN: 16051398) and the Phoenix Partnership High School (BEN: 16057025); operated by the PIMA Prevention Partnership, 3130 East Broadway, Suite 180, Tucson, AZ 85716, as two separate state charters and two separate entities for the purpose of E-rate. This "waiver request" and "appeal" is an urgent matter concerning the enclosed Universal Service Administrative Company (USAC) "Administrator's Decision on Implementation Extension Requests" dated January 20, 2012; wherein the requests for extending the priority two non-recurring services delivery deadline for FY2010 Form 471 741910 (FRNs 2003525, 2003540, 2003548, 2003557 and 2003565) and FY2010 Form 471 753085 (FRNs 2035002 and 2035048) are "Denied in full" and "Request received after the FCC deadline for Implementation Deadline Extension requests which was 09/30/2011" (**Exhibit A**).

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Both applicants, PIMA Partnership Charter Schools "PIMA" and the Phoenix Partnership High School "Phoenix" staff, representatives and service providers acted in good faith in their efforts to comply with the FCC's programmatic rules, procedures and deadlines for submitting the required E-rate forms and documents for FY2010 priority two non-recurring services to the USAC in a timely manner and should not be denied funds where strict adherence to the program rules is unfair, as it is in this case. Accordingly, "PIMA" and "Phoenix", operated by the PIMA Prevention Partnership, respectfully asks that the FCC waive the procedural deadline for Implementation Deadline Extension requests for the priority two non-recurring services in this case and grant this appeal for the reasons set forth herein.

"PIMA" and "Phoenix" share administrative staffing and one technology coordinator for identifying infrastructure needs, coordinating service provider deliveries, managing installations, implementing services and prioritizing five priority two internal connections projects (10 FRNs) at two independent entities located in two different cities within a relatively short amount of time; within 5-6 months of the contract expiration dates, 06/30/2011. Therefore, an agreement was made with the service providers to extend the contract expiration dates whereby a paper Form 500 was submitted in good faith to the USAC on behalf of "PIMA" (Form 471 714910) (5 FRNs) and "Phoenix" (Form 471 753085) (5 FRNs), changing the contract ending dates from 06/30/2011 to 06/30/2012; fully intending to have implementation and invoicing completed for these ten FRNs within the FCC programmatic requirements (**Exhibit B**).

Even though it was originally expected that implementation and invoicing would be completed within the FCC programmatic requirements, five of the FRNs for priority two non-recurring services funded on the FY2010 FCDL 714910 and two of the FRNs funded on the FY2010 FCDL 753085 were either partially completed or not completed by the procedural deadline date 09/30/2011 due to extenuating circumstances that prevented implementation at each of these two separate locations. The extenuating circumstances include opening a new high school in Phoenix as a separate charter, service substitution requests for obsolete equipment for one FRN at each location, an illness and death of an immediate family member, delivery delays, and a misunderstanding with the service providers about the FCC programmatic requirements for extending the FRN contract dates as it relates to extending the implementation and invoice deadline dates for priority two non-recurring services.

Whereby, after delivering the requested priority two non-recurring services on or around October 15, 2011, the service provider attempted to submit an invoice for FRN 2003540 that was subsequently rejected by USAC because the "Billed Date After Contract Expiration Date"

and "Billed Date Outside of Funding Year" (**Exhibit C**). This email from the service provider regarding the rejected invoice caused considerable confusion and identified a misunderstanding and mistakes that were made concerning FCC programmatic rules, procedures and deadlines to not only extend the contract dates, but the implementation and invoice deadline dates for the priority two non-recurring services FRNs on the FY2010 Forms 471 714910 and 753085.

Whereas, realizing that a misunderstanding took place and that a procedural mistake occurred, and according to correspondence with a USAC representative who confirmed that the contract expiration dates were changed and stated that applicant generated Service Delivery Deadline Extension Request letters for the affected FRNs are required for extending the implementation dates beyond 09/30/2011 (Case# 22-295451); whereby on behalf of both "PIMA" and "Phoenix", seven Service Delivery Deadline Extension Request letters (**Exhibit D**) were generated and submitted via USAC's automated on-line "Submit a Question" system on 11/21/2011 and again on 11/30/2011 as requested through a series of six emails (**Exhibit E**) and subsequently "Denied in full" on 01/20/2012, exactly 60 days from the date of the first submissions, because they were received after 09/30/2011 (**Exhibit A**).

Once the Administrator's Decision on Implementation Extension Request denial letters for the priority two non-recurring services were received by both "PIMA" and "Phoenix" representatives, additional correspondence with an ombudsman (Inquiry# 22-326531) determined that, by statute¹, the USAC is unable to assist in this matter even though the FRN contract end dates had been extended until 06/30/2012 with a Form 500 and the Service Delivery Deadline Request letters were submitted upon request within 60 days of the procedural deadline date of 09/30/2011 for priority two non-recurring services (**Exhibit F**).

In summary, there are multiple, separate procedures and differing deadlines for submitting applicant generated forms and letters required by the FCC that either the applicant or the service provider must adhere to for extending either the implementation and/or the invoice deadline dates for priority two non-recurring services; with exception to automatic one year extensions that are granted in cases where the priority two non-recurring service commitments, certain SPIN changes² and service substitutions that are dated on or after March 1 of the relevant funding year, an implementation deadline extension request for priority two non-recurring services are either denied or approved by the USAC, with discretion, and on a case by case basis for an arbitrary amount of time as long as it is received by September 30th of the

¹ FCC 01-195 Federal-State Joint Board on Universal Service, Report and Order 06/29/2001

² FCC 10-175, 25 FCC Sixth Report and Order (2010)

relevant funding year; while an invoice deadline extension request for priority two non-recurring services can be submitted at any time and typically approved by the USAC for an additional 120 days from the date of a programmatically generated email, and a paper Form 500 is only required to be completed by the applicant, if needed, to change the contract date with the service provider and can be submitted at any time. Furthermore, even in cases where the USAC approves said extensions, including service substitutions, it is the applicant's responsibility to seek out and retrieve the actual deadline extension dates on the USAC website³ and in cases where the contract date is extended with the service provider on a paper Form 500, it is also the applicants' responsibility to seek out and retrieve confirmation of same from the USAC. Be that as it may, the FCC programmatic requirements for extending the delivery and/or invoicing deadlines for priority two non-recurring services appear to be conflicting with one another, confusing for applicants, creating undue burden, and unfair in this case. Especially, when the FCC recently released an order⁴ directing the USAC to make available funds for FY2010 priority two requests at all discount levels so that more schools and libraries can upgrade their access to broadband services this year; which in effect automatically extended the FCC programmatic requirements for those applicants whose implementation deadline dates would have originally been 09/30/2011.

Nonetheless, Invoice Deadline Extension Requests for four of the seven affected FRNs, were generated and submitted in good faith on behalf of "PIMA" and "Phoenix" on 02/16/2012 and 02/19/2012 (**Exhibit G**), after corresponding with another USAC representative (Case# 22-333761); of which all four of the Invoice Deadline Extension Requests were approved on 02/24/2012 by the USAC via a programmatic email (**Exhibit H**); wherein the deadline to invoice these priority two non-recurring services is extended an additional 120 days from the date of the email correspondence, even though the Service Delivery Deadline Extension Requests for these same priority two non-recurring services were "Denied in full" by USAC on 01/20/2012 because they were received after 09/30/2011 (**Exhibit A**).

Since "PIMA" and "Phoenix" staff, representatives and service providers acted in good faith to comply with all FCC programmatic requirements, it would be unjust for the FCC to deny this "waiver request" and "appeal" for FY2010 Form 471 741910 (FRNs 2003525, 2003540, 2003548, 2003557 and 2003565) and FY2010 Form 471 753085 (FRNs 2035002 and 2035048) priority two non-recurring services which have already gone through the rigor of a complex

³<http://www.sl.universalservice.org>

⁴ FCC Order DA 11-1354, 08/22/2011

application and review process, and already committed for FY2010 disbursements by USAC to "PIMA" and "Phoenix". Moreover, this was an unintentional procedural mistake rather than an instance of waste, fraud or abuse, misuse of funds or intentional failure to adhere to programmatic requirements. In fact, ten FRN contract end dates were extended to 06/30/2012 with a paper Form 500 that was generated and submitted approximately 90 days prior to the last date to receive priority two non-recurring services, one FRN (2034990) priority two non-recurring service delivery date was automatically extended to 09/30/2012 because the service substitution request was dated 06/20/2011, one FRN (2003525) priority two non-recurring service delivery date was NOT extended with a service substitution request because it was dated 02/28/2011, seven Service Delivery Deadline Extension Request letters were generated and submitted within 60 days after the last date to receive priority two non-recurring services and subsequently "Denied in full" by the USAC (**Exhibit A**), while four Invoice Deadline Extension Request letters were generated and submitted within 130 days after the last date to receive priority two non-recurring services in the relevant funding year and subsequently approved by the USAC (**Exhibit H**). Whereby, both the implementation and invoice deadline extension requests for the affected FRNs were submitted upon discovering that a procedural mistake occurred, corresponding with four different USAC representatives, ensuing confusion, and extenuating circumstances experienced by "PIMA" and "Phoenix" staff, representatives, and service providers.

"PIMA", comprised of two charter schools, serves some of the most highly impoverished at risk students in the Tucson area while "Phoenix", a newly opened (August 2011), separate charter high school, serves some of the most highly impoverished at risk students in the Phoenix area. Presently, more than 86% of the students attending "PIMA" and 90% of the students attending "Phoenix" qualify for Free and/or Reduced Lunches under the National School Lunch Program (NSLP); which by most standards would be considered model schools achieving success with support from the E-rate program. Both "PIMA" and "Phoenix" schools urgently need these already committed FY2010 priority two funds to offset some of the already incurred costs for implementing a telecommunications system and a broadband network infrastructure that provides and promotes dynamic learning opportunities that teach students skills for succeeding in the 21st Century.

Consequently, failure to waive the FCC procedural deadline for Implementation Deadline Extension Requests and remand this FY2010 appeal to the USAC in this case would not serve the public's interest. Rather, it would create undue financial hardship for both "PIMA" and

"Phoenix" students and their communities who are otherwise entitled to receive E-rate support for these already committed FY2010 E-rate priority two non-recurring services and pending this "waiver request" and "appeal", yet to be disbursed for payment. Both "PIMA" and "Phoenix" merely needed more time to implement the already committed FY2010 priority two broadband projects this year.

In addition, given the FCC 2 in 5 rule for E-rate priority two requests, "PIMA", specifically would not only lose approximately \$39,600.00 and \$2,250.00 in committed amounts for two already implemented FY2010 priority two projects and an approximate \$171,000.00 committed amount for one priority two broadband network project pending implementation but would also be ineligible to receive any priority two funds for the next three years because they received eligible disbursements for FY2009 and some of the eligible disbursements for FY2010 priority two requests implemented and invoiced in compliance with FCC programmatic requirements.

Respectfully, and on behalf of the PIMA Prevention Partnership, an expedited decision regarding this "waiver request" and "appeal" for immediate relief would be greatly appreciated.

Thank you for your consideration regarding this matter and for supporting PIMA Partnership Charter Schools and Phoenix Partnership High School, State of Arizona schools.

Sincerely,

A handwritten signature in blue ink, appearing to read "Robert D. Rice".

Robert D. Rice, President
Triple R Consultants

Enc

cc: Tom Miller, PIMA Prevention Partnership
Marie Hezel, World Wide Technology, Inc.
James D. Riley, JNR Networks, LLC
Dean C. Myers, Inventive Technology, Inc.

LIST OF EXHIBITS

CC Docket No. 96-45

CC Docket No. 02-6

"WAIVER REQUEST"

"FY2010 APPEAL"

"Administrator's Decision on Implementation Extension Request"

PIMA Partnership Charter Schools

BEN: 16051398: Form 471 741910

Phoenix Partnership High School

BEN: 16057025: Form 471 753085

- Exhibit A** (5) BEN: 16051398: Administrator's Decision on Implementation Extension Request, dated January 20, 2012
(2) BEN: 16057025: Administrator's Decision on Implementation Extension Request, dated January 20, 2012
- Exhibit B** (1) BEN: 16051398: FY10 Form 500; Form 471 741910, dated June 30, 2011
(1) BEN: 16057025: FY10 Form 500: Form 471 753085, dated June 30, 2011
- Exhibit C** (1) Email: World Wide Technology, Inc., dated October 31, 2011
Re: "Billed Date After Contract Expiration Date"; FRN 2003540
- Exhibit D** Case# 22-295451
(3) BEN: 16051398: Form 471 741910 Service Delivery Deadline Extension Request letters, dated November 21, 2011
(2) BEN: 16057025: Form 471 753085 Service Delivery Deadline Extension Request letters, dated November 21, 2011
- Exhibit E** Case#: (1) 22-295470, (1) 22-295471, (1) 22-295474, (1) 22-295476, (3) 22-295538, (3) 22-295541, and (1) 22-295539
(3) BEN: 16051398: Form 471 741910 Service Delivery Deadline Extension Request letters, dated November 30, 2011
(2) BEN: 16057025: Form 471 753085 Service Delivery Deadline Extension Request letters, dated November 30, 2011
- Exhibit F** (1) Inquiry# 22-326531
E-mail from USAC/SLD Ombudsman Group, dated February 15, 2012
- Exhibit G** Case# 22-333761
(2) BEN: 16051398: Form 471 741910 FRN 2003540 and 2003557 Invoice Deadline Extension Request letters, dated February 16, 2012
(2) BEN: 16057025: Form 471 753085 FRN 2035002 and 2035048 Invoice Deadline Extension Request letters, dated February 19, 2012
- Exhibit H** (1) Email from USAC/SLD, dated February 24, 2012
Re: Invoice Deadline Extension Requests;
FRNs 2003540, 2003557, 2035002 and 2035048

MAR 08 2012

FCC Mail Room

**EXHIBIT A**

Schools and Libraries Division

Administrator's Decision on Implementation Extension Request

January 20, 2012

Robert D. Rice
Triple R Consultants
P.O. Box 302
South Lyon, MI 48178

RE: PIMA PARTNERSHIP CHARTER SCHOOLS

471 Application Number: 741910
Funding Request Number(s): 2003525
Your Correspondence Dated: November 21, 2011

After thorough review and investigation of all relevant facts, the Schools and Libraries Division ("SLD") of the Universal Service Administrative Company ("USAC") has made its decision in regard to your implementation extension request. This letter explains the basis of USAC's decision. The date of this letter begins the 60-day time period for appealing this decision to the Federal Communications Commission (FCC). If your request included more than one Form 471 Application, please note that for each application you will receive a separate determination letter.

Decision on Appeal: **Denied in full**

Explanation: Request received after the FCC deadline for Implementation Deadline Extension requests which was 9/30/2011.

In accordance with the FCC Report and Order (FCC 01-195) released on June 29, 2001, the Administrator may grant an extension of time for the implementation of non-recurring services if the implementation is delayed for circumstances beyond the named service provider's control. You have been unable to establish such circumstances.

TO APPEAL THIS DECISION:

If you wish to appeal a decision in this letter, your appeal must be received by USAC or postmarked within 60 days of the date of this letter. Failure to meet this requirement will result in automatic dismissal of your appeal. In your letter of appeal:

1. Include the name, address, telephone number, fax number, and e-mail address for the person who can most readily discuss this appeal with us.
2. State outright that your letter is an appeal. Include the following to identify the decision letter and the decision you are appealing:
 - Appellant name,
 - Applicant or Service Provider name,

- BEN and/or SPIN,
 - Form 471 and FRN,
 - Invoice number as assigned by SLD,
 - "Administrator's Decision on Implementation Extension Request" dated January 20, 2012 **AND**
 - The exact text or the decision that you are appealing.
3. Please keep your letter to the point, and provide documentation to support your appeal. Be sure to keep a copy of your entire appeal, including any correspondence and documentation.
 4. If you are an applicant, please provide a copy of your appeal to the service provider(s) affected by USAC's decision. If you are a service provider, please provide a copy of your appeal to the applicant affected by USAC's decision.
 5. Provide an authorized signature on your letter of appeal.

To submit your appeal to USAC by email, send your appeal to appeals@sl.universalservice.org. USAC will automatically reply to incoming emails to confirm receipt.

To submit your appeal to USAC by fax, fax your appeal to (973) 599-6542.

To submit your appeal to USAC on paper, send your appeal to:

Letter of Appeal
Schools and Libraries Division – Correspondence Unit
30 Lanidex Plaza West
PO Box 685
Parsippany, NJ 07054-0685

While we encourage you to resolve your appeal with USAC first, you have the option of filing an appeal directly with the Federal Communications Commission (FCC). You should refer to CC Docket No. 02-6 on the first page of your appeal to the FCC. Your appeal must be received by the FCC or postmarked within 60 days of the date of this letter. Failure to meet this requirement will result in automatic dismissal of your appeal. We strongly recommend that you use the electronic filing options described in the "Appeals Procedure" posted in the Reference Area of our web site. If you are submitting your appeal via United States Postal Service, send to: FCC, Office of the Secretary, 445 12th Street SW, Washington, DC 20554.

Schools and Libraries Division
Universal Service Administrative Company

cc: James Riley, JNR Networks LLC
cc: Tom Miller, PIMA PARTNERSHIP CHARTER SCHOOLS

Administrator's Decision on Implementation Extension Request

January 20, 2012

Robert D. Rice
Triple R Consultants
P.O. Box 302
South Lyon, MI 48178

RE: PIMA PARTNERSHIP CHARTER SCHOOLS

471 Application Number: 741910
Funding Request Number(s): 2003540
Your Correspondence Dated: November 21, 2011

After thorough review and investigation of all relevant facts, the Schools and Libraries Division ("SLD") of the Universal Service Administrative Company ("USAC") has made its decision in regard to your implementation extension request. This letter explains the basis of USAC's decision. The date of this letter begins the 60-day time period for appealing this decision to the Federal Communications Commission (FCC). If your request included more than one Form 471 Application, please note that for each application you will receive a separate determination letter.

Decision on Appeal: **Denied in full**

Explanation: Request received after the FCC deadline for Implementation Deadline Extension requests which was 9/30/2011.

In accordance with the FCC Report and Order (FCC 01-195) released on June 29, 2001, the Administrator may grant an extension of time for the implementation of non-recurring services if the implementation is delayed for circumstances beyond the named service provider's control. You have been unable to establish such circumstances.

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Schools and Libraries Division
Universal Service Administrative Company

cc: Jim Mazzio, World Wide Technology, Inc.
cc: Tom Miller, Pima Partnership Charter Schools



Universal Service Administrative Company

Schools and Libraries Division

Administrator's Decision on Implementation Extension Request

January 20, 2012

Robert D. Rice
Triple R Consultants
P.O. Box 302
South Lyon, MI 48178

RE: PIMA PARTNERSHIP CHARTER SCHOOLS

471 Application Number: 741910
Funding Request Number(s): 2003548
Your Correspondence Dated: November 21, 2011

After thorough review and investigation of all relevant facts, the Schools and Libraries Division ("SLD") of the Universal Service Administrative Company ("USAC") has made its decision in regard to your implementation extension request. This letter explains the basis of USAC's decision. The date of this letter begins the 60-day time period for appealing this decision to the Federal Communications Commission (FCC). If your request included more than one Form 471 Application, please note that for each application you will receive a separate determination letter.

Decision on Appeal: **Denied in full**

Explanation: Request received after the FCC deadline for Implementation Deadline Extension requests which was 9/30/2011.

In accordance with the FCC Report and Order (FCC 01-195) released on June 29, 2001, the Administrator may grant an extension of time for the implementation of non-recurring services if the implementation is delayed for circumstances beyond the named service provider's control. You have been unable to establish such circumstances.

TO APPEAL THIS DECISION:

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Schools and Libraries Division
Universal Service Administrative Company

cc: James Riley, JNR Networks LLC
cc: Tom Miller, PIMA PARTNERSHIP CHARTER SCHOOLS



Universal Service Administrative Company

Schools and Libraries Division

Administrator's Decision on Implementation Extension Request

January 20, 2012

Robert D. Rice
Triple R Consultants
P.O. Box 302
South Lyon, MI 48178

RE: PIMA PARTNERSHIP CHARTER SCHOOLS

471 Application Number: 741910
Funding Request Number(s): 2003557
Your Correspondence Dated: November 21, 2011

After thorough review and investigation of all relevant facts, the Schools and Libraries Division ("SLD") of the Universal Service Administrative Company ("USAC") has made its decision in regard to your implementation extension request. This letter explains the basis of USAC's decision. The date of this letter begins the 60-day time period for appealing this decision to the Federal Communications Commission (FCC). If your request included more than one Form 471 Application, please note that for each application you will receive a separate determination letter.

Decision on Appeal: **Denied in full**

Explanation: Request received after the FCC deadline for Implementation Deadline Extension requests which was 9/30/2011.

In accordance with the FCC Report and Order (FCC 01-195) released on June 29, 2001, the Administrator may grant an extension of time for the implementation of non-recurring services if the implementation is delayed for circumstances beyond the named service provider's control. You have been unable to establish such circumstances.

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Schools and Libraries Division
Universal Service Administrative Company

cc: Dean Myers, Inventive Technology, Inc.
cc: Tom Miller, Pima Partnership Charter Schools



Universal Service Administrative Company

Schools and Libraries Division

Administrator's Decision on Implementation Extension Request

January 20, 2012

Robert D. Rice
Triple R Consultants
P.O. Box 302
South Lyon, MI 48178

RE: PIMA PARTNERSHIP CHARTER SCHOOLS

471 Application Number: 741910
Funding Request Number(s): 2003565
Your Correspondence Dated: November 21, 2011

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1. Include the name, address, telephone number, fax number, and e-mail address for the person who can most readily discuss this appeal with us.
2. State outright that your letter is an appeal. Include the following to identify the decision letter and the decision you are appealing:
 - Appellant name,
 - Applicant or Service Provider name,

- BEN and/or SPIN,
 - Form 471 and FRN,
 - Invoice number as assigned by SLD,
 - "Administrator's Decision on Implementation Extension Request" dated January 20, 2012 **AND**
 - The exact text or the decision that you are appealing.
3. Please keep your letter to the point, and provide documentation to support your appeal. Be sure to keep a copy of your entire appeal, including any correspondence and documentation.
 4. If you are an applicant, please provide a copy of your appeal to the service provider(s) affected by USAC's decision. If you are a service provider, please provide a copy of your appeal to the applicant affected by USAC's decision.
 5. Provide an authorized signature on your letter of appeal.

To submit your appeal to USAC by email, send your appeal to appeals@sl.universalservice.org. USAC will automatically reply to incoming emails to confirm receipt.

To submit your appeal to USAC by fax, fax your appeal to (973) 599-6542.

To submit your appeal to USAC on paper, send your appeal to:

Letter of Appeal
Schools and Libraries Division – Correspondence Unit
30 Lanidex Plaza West
PO Box 685
Parsippany, NJ 07054-0685

While we encourage you to resolve your appeal with USAC first, you have the option of filing an appeal directly with the Federal Communications Commission (FCC). You should refer to CC Docket No. 02-6 on the first page of your appeal to the FCC. Your appeal must be received by the FCC or postmarked within 60 days of the date of this letter. Failure to meet this requirement will result in automatic dismissal of your appeal. We strongly recommend that you use the electronic filing options described in the "Appeals Procedure" posted in the Reference Area of our web site. If you are submitting your appeal via United States Postal Service, send to: FCC, Office of the Secretary, 445 12th Street SW, Washington, DC 20554.

Schools and Libraries Division
Universal Service Administrative Company

cc: James Riley, JNR Networks LLC
cc: Tom Miller, PIMA PARTNERSHIP CHARTER SCHOOLS



Administrator's Decision on Implementation Extension Request

January 20, 2012

Robert D. Rice
Triple R Consultants
P.O. Box 302
South Lyon, MI 48178

Phoenix Partnership High School

RE: PIMA PARTNERSHIP CHARTER SCHOOLS

471 Application Number: 753085
Funding Request Number(s): 2035002
Your Correspondence Dated: November 21, 2011

After thorough review and investigation of all relevant facts, the Schools and Libraries Division ("SLD") of the Universal Service Administrative Company ("USAC") has made its decision in regard to your implementation extension request. This letter explains the basis of USAC's decision. The date of this letter begins the 60-day time period for appealing this decision to the Federal Communications Commission (FCC). If your request included more than one Form 471 Application, please note that for each application you will receive a separate determination letter.

Decision on Appeal: **Denied in full**

Explanation: Request received after the FCC deadline for Implementation Deadline Extension requests which was 9/30/2011.

In accordance with the FCC Report and Order (FCC 01-195) released on June 29, 2001, the Administrator may grant an extension of time for the implementation of non-recurring services if the implementation is delayed for circumstances beyond the named service provider's control. You have been unable to establish such circumstances.

TO APPEAL THIS DECISION:

If you wish to appeal a decision in this letter, your appeal must be received by USAC or postmarked within 60 days of the date of this letter. Failure to meet this requirement will result in automatic dismissal of your appeal. In your letter of appeal:

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Schools and Libraries Division
 Universal Service Administrative Company

cc: Jim Mazzio, World Wide Technology, Inc.
 cc: Tom Miller, PIMA PARTNERSHIP CHARTER SCHOOLS

Administrator's Decision on Implementation Extension Request

January 20, 2012

Robert D. Rice
Triple R Consultants
P.O. Box 302
South Lyon, MI 48178

Phoenix Partnership High School

RE: PIMA PARTNERSHIP CHARTER SCHOOLS

471 Application Number: 753085
Funding Request Number(s): 2035048
Your Correspondence Dated: November 21, 2011

After thorough review and investigation of all relevant facts, the Schools and Libraries Division ("SLD") of the Universal Service Administrative Company ("USAC") has made its decision in regard to your implementation extension request. This letter explains the basis of USAC's decision. The date of this letter begins the 60-day time period for appealing this decision to the Federal Communications Commission (FCC). If your request included more than one Form 471 Application, please note that for each application you will receive a separate determination letter.

Decision on Appeal: **Denied in full**

Explanation: Request received after the FCC deadline for Implementation Deadline Extension requests which was 9/30/2011.

In accordance with the FCC Report and Order (FCC 01-195) released on June 29, 2001, the Administrator may grant an extension of time for the implementation of non-recurring services if the implementation is delayed for circumstances beyond the named service provider's control. You have been unable to establish such circumstances.

TO APPEAL THIS DECISION:

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 - Invoice number as assigned by SLD,
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Schools and Libraries Division
Universal Service Administrative Company

cc: Dean Myers, Inventive Technology, Inc.
cc: Tom Miller, PIMA PARTNERSHIP CHARTER SCHOOLS

Do Not Write In This Area

Approval by 3060-0853
Estimated time per response:
1.5 hours

**Universal Service for Schools and Libraries
Adjustment to Funding Commitment and
Modification to Receipt of Service Confirmation Form**

EXHIBIT B**Please read instructions before completing.**

(To be completed by Schools and Libraries or Consortia.)

Applicant's Form Identifier: **FY10-500**
(Create your own code to identify THIS Form 500)Form 500 Application Number:
(To be assigned by administrator.)**Block 1: Applicant Information**

1. Name of Billed Entity Pima Partnership Charter Schools	2. Billed Entity Number 16051398	3. Funding Year FY2010
4. Complete Mailing Address of Billed Entity Applicant Street Address, P. O. Box or Route Number City State Zip Code 3130 East Broadway Suite 180 Tucson AZ 85716		
10-Digit Phone Number 520-791-2711	Fax Telephone Number 520-326-2711	Email Address tmiller@telpartnership-us
5. Contact Person Information		
Contact Person Name Tom Miller		
Mailing Address Street Address, P. O. Box or Route Number City State Zip Code 3130 East Broadway Suite 180 Tucson AZ 85716		
10-Digit Phone Number 520-791-2711	Fax Telephone Number 520-326-2527	Email Address tmiller@telpartnership-us

FCC NOTICE FOR INDIVIDUALS REQUIRED BY THE PRIVACY ACT AND THE PAPERWORK REDUCTION ACT

Part 54 of the Commission's Rules authorizes the FCC to collect the information on this form. Failure to provide all requested information will delay the processing of the application or result in the application being returned without action. Information requested by this form will be available for public inspection. Your response is required to obtain the requested authorization.

The public reporting for this collection of information is estimated to range from 1 to 2 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the required data, and completing and reviewing the collection of information. If you have any comments on this burden estimate, or how we can improve the collection and reduce the burden it causes you, please write to the Federal Communications Commission, AMD-PERF, Paperwork Reduction Act Project (3060-0853), Washington, DC 20554. We will also accept your comments regarding the Paperwork Reduction Act aspects of this collection via the Internet if you send them to PRA@fcc.gov. PLEASE DO NOT SEND YOUR RESPONSE TO THIS FORM TO THIS ADDRESS.

Remember - You are not required to respond to a collection of information sponsored by the Federal government, and the government may not conduct or sponsor this collection, unless it displays a currently valid OMB control number or if we fail to provide you with this notice. This collection has been assigned an OMB control number of 3060-0853.

THE FOREGOING NOTICE IS REQUIRED BY THE PRIVACY ACT OF 1974, PUBLIC LAW 93-579, DECEMBER 31, 1974, 5 U.S.C. 552a(e)(3) AND THE PAPERWORK REDUCTION ACT OF 1995, PUBLIC LAW 104-13, OCTOBER 1, 1995, 44 U.S.C. SECTION 3507.

Billed Entity Name Pima Partnership Charter Schools Contact Name Tom Miller

Billed Entity Number 110051398 Contact Telephone Number 520-791-2711

Block 2: Services Adjustment: Fill in one Block 2 for EACH Funding Request (FRN) affected. If you are submitting more than one Block 2, please number your pages 2A, 2B, 2C, etc. and write the number in the space provided here:
Page 2 A

5. Provide the following information about each service cited in your Form 471 Block 5, Discount Funding Request, (FRN) for which you want to take one of the following actions:

Remember: The FRNs listed on this form must be for the same Funding Year as listed in Item 3, Block 1.

New Start Date: If you wish to change the Funding Year Service Start Date you listed on a previously filed Form 486 in this funding year. This action will NOT result in more funding.

Contract Expiration Date: If you wish to change the ending date for services. This action will not result in more funding but you could combine it with a reduction in funding.

Cancel: If you wish to cancel a Funding Request Number. Please note: This action is irrevocable and the FRN can NOT be reinstated later. This action would allow money to be put back into the Universal Service fund for possible commitment to other applicants.

Reduce: If you wish to reduce the amount of your funding commitment for a particular FRN. This action is irrevocable and the FRN can NOT be increased later. This action would allow money to be put back into the Universal Service fund for possible commitment to other applicants.

The information required can be found in your Funding Commitment Decision Letter (FCDL) pertaining to the Funding Request (FRN) being affected.

To launch the submission of invoices for payment, please file **Form 486**.

IDENTIFICATION OF THE FRN TO BE ADJUSTED

(A) Form 471 Application Number: 741910
(B) Funding Request Number: 2003525
(C) Billing Account Number: N/A
(D) Service Provider Name: JNR Networks
(E) Service Provider SPIN: 143033197

ADJUSTMENT TO FRN LISTED ABOVE:

(F) Service Start Date	Original Date (mm/dd/yyyy):	New Date (mm/dd/yyyy):
Change Date		
(G) Contract Expiration Date	Original Date (mm/dd/yyyy):	New Date (mm/dd/yyyy):
Change Date	<u>6-30-2011</u>	<u>6-30-2012</u>
(H) Cancel FRN	Original Commitment Amount:	New Commitment Amount:
Please Cancel		\$0.00
(I) Reduce FRN	Original Commitment Amount from FCDL:	New Commitment Amount AFTER Reduction:
Please Reduce		

Billed Entity Name Pinn Partnership Charter Schools Contact Name Tom Miller

Billed Entity Number 110051398 Contact Telephone Number 520-791-2711

Block 2: Services Adjustment: Fill in one Block 2 for EACH Funding Request (FRN) affected. If you are submitting more than one Block 2, please number your pages 2A, 2B, 2C, etc. and write the number in the space provided here:
Page 2 B

5. Provide the following information about each service cited in your Form 471 Block 5, Discount Funding Request, (FRN) for which you want to take one of the following actions:

Remember: The FRNs listed on this form must be for the same Funding Year as listed in Item 3, Block 1.

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Contract Expiration Date: If you wish to change the ending date for services. This action will not result in more funding but you could combine it with a reduction in funding.

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Reduce: If you wish to reduce the amount of your funding commitment for a particular FRN. This action is irrevocable and the FRN can NOT be increased later. This action would allow money to be put back into the Universal Service fund for possible commitment to other applicants.

The information required can be found in your Funding Commitment Decision Letter (FCDL) pertaining to the Funding Request (FRN) being affected.

To launch the submission of invoices for payment, please file **Form 486**.

IDENTIFICATION OF THE FRN TO BE ADJUSTED

(A) Form 471 Application Number: 741910

(B) Funding Request Number: 2003540

(C) Billing Account Number: N/A

(D) Service Provider Name: World Wide Technology

(E) Service Provider SPIN: 143020028

ADJUSTMENT TO FRN LISTED ABOVE:

(F) Service Start Date	Original Date (mm/dd/yyyy):	New Date (mm/dd/yyyy):
Change Date		
(G) Contract Expiration Date	Original Date (mm/dd/yyyy):	New Date (mm/dd/yyyy):
Change Date	<u>6-30-2011</u>	<u>6-30-2012</u>
(H) Cancel FRN	Original Commitment Amount:	New Commitment Amount:
Please Cancel		\$0.00
(I) Reduce FRN	Original Commitment Amount from FCDL:	New Commitment Amount AFTER Reduction:
Please Reduce		

Billed Entity Name <u>Pima Partnership Charter Schools</u> Contact Name <u>Tom Miller</u>		
Billed Entity Number <u>16051398</u> Contact Telephone Number <u>520-791-2711</u>		
Block 2: Services Adjustment: Fill in one Block 2 for EACH Funding Request (FRN) affected. If you are submitting more than one Block 2, please number your pages 2A, 2B, 2C, etc. and write the number in the space provided here: <div style="text-align: right;">Page 2 <u>C</u></div>		
<p>5. Provide the following information about each service cited in your Form 471 Block 5, Discount Funding Request, (FRN) for which you want to take one of the following actions:</p> <p>Remember: The FRNs listed on this form must be for the same Funding Year as listed in Item 3, Block 1.</p> <p>New Start Date: If you wish to change the Funding Year Service Start Date you listed on a previously filed Form 486 in this funding year. This action will NOT result in more funding.</p> <p>Contract Expiration Date: If you wish to change the ending date for services. This action will not result in more funding but you could combine it with a reduction in funding.</p> <p>Cancel: If you wish to cancel a Funding Request Number. Please note: This action is irrevocable and the FRN can NOT be reinstated later. This action would allow money to be put back into the Universal Service fund for possible commitment to other applicants.</p> <p>Reduce: If you wish to reduce the amount of your funding commitment for a particular FRN. This action is irrevocable and the FRN can NOT be increased later. This action would allow money to be put back into the Universal Service fund for possible commitment to other applicants.</p> <p>The information required can be found in your Funding Commitment Decision Letter (FCDL) pertaining to the Funding Request (FRN) being affected.</p> <p>To launch the submission of invoices for payment, please file Form 486.</p>		
IDENTIFICATION OF THE FRN TO BE ADJUSTED		
(A) Form 471 Application Number: <u>741910</u>		
(B) Funding Request Number: <u>2003548</u>		
(C) Billing Account Number: <u>N/A</u>		
(D) Service Provider Name: <u>JNR Networks</u>		
(E) Service Provider SPIN: <u>143033197</u>		
ADJUSTMENT TO FRN LISTED ABOVE:		
(F) Service Start Date	Original Date (mm/dd/yyyy):	New Date (mm/dd/yyyy):
Change Date		
(G) Contract Expiration Date	Original Date (mm/dd/yyyy):	New Date (mm/dd/yyyy):
Change Date	<u>6-30-2011</u>	<u>6-30-2012</u>
(H) Cancel FRN	Original Commitment Amount:	New Commitment Amount:
Please Cancel		\$0.00
(I) Reduce FRN	Original Commitment Amount from FCDL:	New Commitment Amount AFTER Reduction:
Please Reduce		